

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 00-CR-~~6088~~-SEITZ

6309

UNITED STATES OF AMERICA,

Plaintiff,

v.

JOSEPH RUSSO AND  
DOREEN RUSSO,

Defendants.

**UNOPPOSED MOTION TO EXTEND TIME TO FILE PRETRIAL MOTIONS**

DOREEN RUSSO, through undersigned counsel, moves the Court to extend the time for filing Pretrial Motions. Her co-defendant husband, Joseph Russo, joins in this motion.

On August 14, 2001, Doreen Russo was named in a superseding indictment alleging various violations of federal law, including RICO. She made her initial appearance on August 21, 2001. She was arraigned on September 21, 2001, at which time undersigned made a permanent appearance in the case. The Magistrate Judge entered the standing discovery order which provides that all pretrial motions should be filed within 28 days. Accordingly, pretrial motions are due on October 19, 2001.

On September 21, 2001, Judge Seitz held a pretrial conference. It appears that because undersigned counsel was not yet permanent counsel in the case, the clerk's office did not provide notice to Doreen Russo or undersigned counsel of that pretrial conference.

Undersigned did not attend. Today, undersigned received Judge Seitz's order setting a trial date of February 11, 2002. However, other defense counsel in the case have advised that Judge Seitz might be inclined to reset the trial for a date for late March 2002.

Undersigned counsel is specially set to begin a 2-3 week trial on October 15, 2001 in United States v. Kranzler, et al., Case No. 99-366-Cr-Moreno.

Undersigned counsel has been advised the discovery in this case consists of approximately ten banker boxes containing some thirty thousand documents. There are also numerous audio tapes stemming from a wire tap.

In order to prepare pretrial motions, undersigned counsel would like an adequate opportunity to review the discovery and research the pertinent legal issues. Undersigned is requesting that this Court extend the deadline for filing pretrial motions until at least November 16, 2001.

Undersigned has spoken with AUSA Brian McCormick who indicated he does not object to this request.

Respectfully submitted,

**BLACK, SREBNICK & KORNSPAN, P.A.**

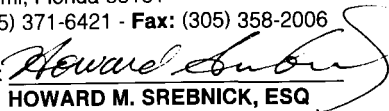
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**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on 9/28/01, 2001 a true and correct copy of the foregoing

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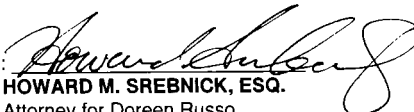
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